



Transportation Safety Equipment Institute

December 9, 2019

The Honorable James C. Owens
Acting Administrator
National Highway Traffic Safety Administration
Docket Management Facility M-30
1200 New Jersey Avenue, S.E.
West Building, Ground Floor, Room W12-140
Washington, DC 20590

Re: Advanced Notice of Proposed Rulemaking (ANPRM) on Federal
Motor Vehicle Safety Standard No. 111, *Rear Visibility* (Docket
No. NHTSA-2018-0021); 84 Fed. Reg. 54533 (October 10, 2019)

Dear Acting Administrator Owens:

This comment is submitted on behalf of the Transportation Safety Equipment Institute (TSEI), a trade association representing manufacturers of vehicular safety equipment, including lighting, reflective devices, and emergency products. TSEI welcomes the opportunity to provide this comment with respect to the National Highway Traffic Safety Administration's (NHTSA's) Advanced Notice of Proposed Rulemaking (ANPRM) on Federal Motor Vehicle Safety Standard No. 111, *Rear Visibility*, Advanced Notice of Proposed Rulemaking (Docket No. NHTSA-2018-0021); 84 *Fed. Reg.* 54533 (October 10, 2019).

TSEI appreciates the opportunity to comment on the proposed alternative compliance option with camera monitor systems (CMS). While TSEI recognizes that CMS is an additional technology that may increase visibility and, therefore, vehicle safety, there are considerations that need to be addressed and weighed before a final rule is adopted.

1. CMS Inoperable or Obscured. There may be times when the CMS is either inoperable or obscured by rain, dirt or debris. When the CMS becomes inoperable/obscured, a vehicle equipped only with CMS would be unable to meet the FMVSS 111 requirement of a "clear and reasonable unobstructed view."

2. Human Factors. There will be a significant adjustment period for drivers to familiarize themselves with utilizing CMS in the absence of mirrors, resulting in a negative effect to vehicle safety.

TSEI appreciates NHTSA's review of the current regulations in an effort to improve safety, and we encourage NHTSA to further improve safety and visibility by requiring CMS in conjunction with rearview mirrors for redundancy. This would address the aforementioned concerns related to inoperability/obscure of CMS, as well as the human factors issues that could arise in a transition from rearview mirrors to CMS exclusively.

TSEI appreciates the opportunity to comment on the ANPRM. We would be pleased to discuss our comments further with Agency staff.

Sincerely,

A handwritten signature in cursive script that reads "Paul Menig".

Paul Menig
Executive Director